

# Generic Conferencing, LLC

The simple conferencing solution.

February 25, 2011

**Via Electronic Filing**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, DC 20554

**Re: Generic Conferencing LLC - CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Generic Conferencing LLC, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2010 CPNI compliance certification.

Please direct any questions regarding this submission to the undersigned at (817) 385-1005.

Very truly yours,



Enclosure

cc: Best Copy and Printing, Inc. (via E-Mail)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 25, 2011

Name of company covered by this certification: Generic Conferencing LLC

Form 499 Filer ID: 827624

Name of Signatory: Michael S. Young

Title of Signatory: President


I, Michael S. Young, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining the company's compliance with the requirements set forth in section 64.2001 *et seq.* of the commission's rules.

The company has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47.C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

## **Statement of Generic Conferencing LLC Processes Protecting CPNI**

### ***Background***

Generic Conferencing LLC is an enhanced service provider offering a variety of Internet-based services including VoIP-based audio conferencing. The company provides services exclusively to business customers, and the company maintains an electronic address of record for each customer.

Generic Conferencing has found that certain aspects of the FCC's CPNI regulations are difficult and/or impossible for audio conferencing providers to follow. For instance, the regulations define the customer's "Telephone number of record" as "The telephone number associated with the underlying service, not the telephone number supplied as a customer's contact information." Certain aspects of the Commission's rules specify using the customer's "Telephone number of record." But providers like Generic Conferencing have no other telephone number associated with their customers other than one provided as contact information by their customers. In the case of conference calling, the "telephone number of record" for the service provided is the conference bridge number. This is due to the fact that conference call providers like Generic Conferencing do not provide basic telephone service; instead, we provide additional services that require customers to have pre-existing telephone numbers and telecommunications services. Accordingly, it is impossible for providers of conferencing services to contact their customers using the customer's "Telephone number of record." Despite issues such as this one, Generic Conferencing believes it has implemented policies and procedures to conform to not only the letter but the spirit of the FCC's regulations.

### ***Policies and Procedures for Ensuring Protection of CPNI***

New customers subscribing to Generic Conferencing services have a username and password established at the time of service initiation. The username and password are randomly generated and not based on any identifiable biographical or account information. Customers who lose their username or password are able to initiate having a new password sent to the e-mail address of record.

Generic Conferencing may, as permitted by the CPNI rules, use CPNI without customer approval to bill and collect for services rendered and to protect the rights or property of the Company, other users or other carriers from unlawful use .

Customers that contact Generic Conferencing support are authenticated based on their e-mail address (the electronic address of record). If the customer contact responsible for the service changes and the new customer contact does not have access to the former customer contact's email address, a letter written on the letterhead of the customer and signed by an officer of the customer organization is required to gain access to the account. Contacts from e-mail addresses that do not match the address on file are not given access to any information regarding existing services or billing.

Customers can login or call customer service to change their password or e-mail addresses. Customers who login and change their password or e-mail address are notified via their address of record after changes are made. In the case of e-mail address changes, notification of the change is sent to the email address that was previously on file before the change was made.

Generic Conferencing does not provide CPNI without proper customer authentication and does not provide call detail records over the phone. In order to authenticate a customer's identity prior to disclosing CPNI, Generic Conferencing authenticates the customer using the pre-established account password. Call detail records are only provided via e-mail to the customer's electronic address of record or via secure Internet site to customer using the proper username and password.

Generic Conferencing does not use CPNI information to market services to its customer base. As such, Generic Conferencing does not engage in any marketing activities that would require consent from its customer base. From the time the CPNI rules became applicable to the Company, there have been no marketing campaigns targeting existing customers.

No joint ventures have been undertaken or subcontractors used by Generic Conferencing or are contemplated for the near future. Generic Conferencing does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services.

All employees have had training sessions on CPNI rules, and have been notified of the penalties associated with violations of CPNI regulations – up to and including termination of employment. All employees have been notified of the need to inform their supervisor if a customer alleges a CPNI breach has occurred.

All data access on Generic Conferencing internal systems is logged and an audit trail is available to identify breaches in CPNI access. All e-mail from customers is archived and saved indefinitely for audit purposes. Employees are only granted access to data commensurate with their support responsibilities.

Access to data stored in the company's databases is protected by firewalls. Access to this data from outside the company's physical network is only permitted through encrypted tunnels. The company's website uses SSL certificates and encryption to prevent hackers from obtaining data over the Internet.

Physical access to the company's databases is protected by typical data center security measures, including positive identification, video surveillance electronic pass keys and physical locks.

Generic Conferencing has procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Generic Conferencing will notify affected customers. Generic Conferencing will maintain a record of any CPNI-related breaches for a period of at least two years.

### ***Conclusion***

Generic Conferencing recognizes the need to protect the private information it stores related to its customers. The company believes it adheres to the FCC's guidelines on these matters.